

1 KAREN L. HANKS, ESQ.  
Nevada Bar No. 9578  
2 E-mail: karen@hankslg.com  
CHANTEL M. SCHIMMING, ESQ.  
3 Nevada Bar No. 8886  
E-mail: chanel@hankslg.com  
4 ANA P. MURGUIA, ESQ.  
Nevada Bar No. 16284  
5 E-mail: ana@hankslg.com  
HANKS LAW GROUP  
6 7625 Dean Martin Drive, Suite 110  
Las Vegas, Nevada 89139  
7 Telephone: (702) 758-8434  
*Attorneys for SFR Investments Pool 1, LLC*  
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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 SFR INVESTMENTS POOL 1, LLC,

12 Plaintiff,

13 vs.

14 BANK OF AMERICA, N.A.; DOES I through  
15 X, inclusive; and ROE BUSINESS ENTITIES  
I through X, inclusive,

16 Defendants.  
17

Case No. 2:22-cv-00629-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY AND  
DISPOSITIVE MOTION DEADLINES**

18 SFR Investments Pool 1, LLC (“SFR”) and Bank of America, N.A., (“BANA”) hereby  
19 respectfully submit this Stipulation and Order to Extend Discovery and Dispositive Motion  
20 Deadlines pursuant to LR 26-4 and LR IA 6-1.

21 On October 25, 2022, the parties, Karen L. Hanks, Esq. for SFR and Scott R. Lachman,  
22 Esq. for the Bank conducted a meet and confer to secure dates to schedule the depositions of the  
23 30(b)(6) witnesses for BANA and SFR. At this time, the parties have agreed to schedule the  
24 depositions for BANA on December 13, 2022, and SFR for December 14, 2022. The parties  
25 hereby request to extend the discovery deadlines to January 7, 2023, the dispositive motions  
26 deadline to February 6, 2023, and the Pre-trial Order deadline to March 8, 2023.

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**I. DISCOVERY COMPLETED:**

A. Initial and Supplement Disclosures:

1. On July 15, 2022, SFR served its Initial Disclosures.
2. On July 5, 2022, Bank of America served its Initial Disclosures.

B. Initial and Rebuttal Expert Disclosures:

N/A

C. Written Discovery:

1. On October 4, 2022, SFR served its First Sets of Requests for Admission, Interrogatories, and Requests for Production of Documents to Bank of America.

D. Depositions:

1. TBD

**II. SPECIFIC DESCRIPTION OF DISCOVERY THAT REMAINS TO BE COMPLETED:**

A. Written Discovery:

1. First set of interrogatories, requests for production of documents and requests for admission from Bank of America to SFR Investments Pool 1, LLC.

B. Depositions:

1. SFR's deposition of the Fed. R. Civ. P. 30(b)(6) witness for Bank of America.
2. Bank of America's deposition of the Fed. R. Civ. P. 30(b)(6) witness for SFR.
3. Any additional depositions by the parties as necessary pursuant to the discovery process.

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**III. REASONS WHY DISCOVERY WAS NOT COMPLETED WITHIN TIME LIMITS SET BY DISCOVERY PLAN:**

As required by LR 26-4, because this stipulation is being submitted within twenty-one (21) days of the discovery deadline, the parties must demonstrate good cause. Good cause is present to allow the parties an additional sixty (60) days to complete the remaining discovery. Specifically, the scheduling of the depositions of the 30(b)(6) witnesses for SFR and Bank of America, which the parties had difficulty scheduling within the discovery deadlines due to witness availability as well as counsel for both parties having numerous additional caseload scheduling conflicts.

Accordingly, for the reasons stated above, good cause exists for the parties' requested extension of the discovery and dispositive motion deadlines.

**IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

<u>Event</u>	<u>Previous Deadline</u>	<u>New Deadline</u>
Discovery Cut-Off	Monday, November 7, 2022	Friday, January 6, 2023
Dispositive Motions	Wednesday, December 7, 2022	Monday, February 6, 2023
Pre-Trial Order	Friday, January 6, 2023	Wednesday, March 8, 2023

The parties submit this Stipulation and Order in good faith and not for purposes of delay or to prejudice any party.

DATED this 27<sup>th</sup> day of October, 2022.

DATED this 27<sup>th</sup> day of October, 2022.

**HANKS LAW GROUP**

**AKERMAN LLP**

/s/ Karen L. Hanks

/s/ Scott R. Lachman

KAREN L. HANKS, ESQ.  
Nevada Bar No. 9578  
CHANTEL M. SCHIMMING, ESQ.  
Nevada Bar No. 8886  
ANA P. MURGUIA, ESQ.  
Nevada Bar No. 16284  
7625 Dean Martin Drive, Suite 110  
Las Vegas, Nevada 89139  
*Attorneys for SFR Investments Pool 1, LLC*

SCOTT R. LACHMAN, ESQ.  
Nevada Bar No. 12016  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
*Attorneys for Nationstar Mortgage, LLC and  
Federal National Mortgage Association*

**ORDER**

IT IS SO ORDERED

DATED: 1:26 pm, October 28, 2022

  
BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE